

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

ERINN HENDRICKSON, as Next Friend )  
of minors L.H., L.E., J.E., and A.K., and )  
CIARA VALENTINE, collectively, the )  
minor children of deceased TERRY )  
EDWARDS, )

Plaintiffs, )

v. )

Case No. 4:17-cv-217-SPM

JEFFERSON COUNTY, MISSOURI, )  
CORRECT CARE SOLUTIONS, LLC )  
f/k/a CHC COMPANIES, INC., et al., )

Defendants. )

**PLAINTIFF CIARA VALENTINE’S  
MOTION TO ENFORCE SETTLEMENT AGREEMENT**

Plaintiff Ciara Valentine, by and through her attorney, moves to enforce the Settlement Agreement (“Agreement”) reached between the parties in this matter. Pursuant to the Agreement, Plaintiffs agreed to a full release of Defendants with a confidentiality and non-disparagement provisions and Defendants agreed to pay Plaintiffs a settlement payment. This Court has the necessary authority to enforce the Agreement. See McClaskey v. LaPlata R-II School Dist., 2006 WL 3803696, \*8 (E.D.Mo. Nov. 7, 2006)(citing Caleshu v. Merrill Lynch, 737 F.Supp. 1070, 1086 (E.D.Mo. 1990), *aff’d*, 985 F.2d 564 (8<sup>th</sup> Cir. 1991)). In support of this Motion, Plaintiff Ciara Valentine submits a Memorandum of Law in Support.

Wherefore, Plaintiff Ciara Valentine respectfully requests that this Court enter an order enforcing the Agreement as stated above, enter an award ordering Next Friend Erinn Hendrickson to pay the reasonable costs and attorneys’ fees incurred by Plaintiff Ciara Valentine, and grant such further relief as the Court deems proper.

Respectfully submitted,

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/s/ William P. Hogan  
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Attorneys for Respondent

**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 20<sup>th</sup> day of February, 2018, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all attorneys of record.

/s/ William P. Hogan